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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 00-6022-CIV-LENARD
Magistrate Judge Turnoff

00-22001 mp

HENRY NARANJO and
MARLENE RAMIREZ,

Plaintiffs,

v.

STEPHEN BYRON SMITH, and
PALMER JOHNSON, INC.,

Defendants.

AGREED MOTION TO EXTEND EXPERT DISCOVERY DEADLINE

COMES NOW, the Defendant, PALMER JOHNSON, INC., by and through its undersigned attorneys, and files this Agreed Motion to Extend Expert Discovery Deadline in support thereof, and states as follows:

1. That on pursuant to this Court's most recent Trial Order, the expert discovery deadline has been set at July 2, 2001.

2. However, because of the entry of a new Defendant, Tom Fexas Yacht Designs, Inc., as well as the voluminous amount of expert discovery which needs to be accomplished, the parties are jointly petitioning this Court for enlargement of time for sixty (60) days, up through and including August 31, 2001, within which to accomplish the expert discovery.

3. Moreover, the Mediation of this claim has been scheduled for August 31, 2001, and the extension will allow the parties to better prepare for Mediation.

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4. That this motion is made in good faith for the good causes outlined above, and not for the purpose of delay.

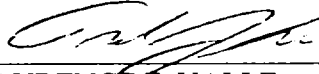
WHEREFORE the Defendant, PALMER JOHNSON, INC., prays that this Court enter an order granting this Agreed Motion to Extend Expert Discovery Deadline, and provide that expert discovery may be completed up through and including August 31, 2001.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing motion has been furnished by mail this **2nd** day of July, 2001 to: **Manuel Valdes, Esquire**, Law Offices of Manuel Valdes, Attorneys for Plaintiffs, 910 Madrid Street, Coral Gables, Florida 33134; **F. David Famulari, Esquire**, Co-Counsel for Plaintiffs, Blanck & Perry, P.A., 5730 SW 74th St., Suite 700, Miami, FL 33143; **John D. Kallen, Esquire**, Badiak, Will & Kallen, Attorneys for Stephen Byron Smith, 17071 West Dixie Highway, North Miami Beach, Florida 33160; and David L. Weber, Esquire, Pinkert Law Firm LLP, 454 Kentucky Street, P.O. Box 89, Sturgeon Bay, WI 54235-0089.

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